

EDMUND G. BROWN JR.  
GOVERNORMATTHEW RODRIGUEZ  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION**Los Angeles Regional Water Quality Control Board**

October 31, 2013

Mr. Dick Johnson  
Home Depot, Western Division  
3800 West Chapman Avenue  
Orange, California 92868

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED  
7012 1640 0000 6228 3192

**SUBJECT: APPROVAL OF TECHNICAL REPORT - REMEDIAL ACTION PLAN FOR RESIDUAL HEXAVALENT CHROMIUM REMEDIATION**

**SITE: HOME DEPOT FACILITY, 1200 FLOWER STREET, BURBANK, CALIFORNIA 91502 RWQCB FILE NO. 109.0582; SITE ID NO. 2040154**

Dear Mr. Johnson:

On June 9, 2013, the California Regional Water Quality Control Board, Los Angeles (Regional Board) directed Home Depot, Western Region (Home Depot), in a California Water Code (CWC) section 13267 Order No. R4-013-0088 to submit a subsurface Soil and Groundwater Investigation and Remediation Work Plan (Work Plan) for the property (Site) located at 1200 Flower Street, Burbank, California 91501. On June 26, 2013, the Regional Board received a technical document entitled "*Remedial Action Plan for residual Hexavalent Chromium [Remedial Action Plan (RAP) Amendment]*," (Geosyntec, June 26, 2013).

In the 1990s, Home Depot entered an agreement with ITT (the Site owner at that time) to purchase the Site. In June 2000, Environmental Strategies Corporation, on behalf of ITT and Home Depot, submitted a Remedial Action Plan (RAP) to the Regional Board for the Site and in 2001 Geosyntec on behalf of Home Depot submitted a Baseline Human Health Risk Assessment. In February 2002 Geosyntec submitted a Basis of Design Report that refined the RAP. Home Depot purchased the Site from ITT in June 2004 and agreed as part of the land purchase agreement to remediate the area known as the shallow zone, which consisted of onsite soil and groundwater occurring above the "Fine Grained Layer (FGL)" that is present at an elevation of approximately 45 to 55-feet below ground surface (bgs). ITT maintains responsibility associated with regional groundwater and soil beneath the Site wide FGL as well as certain potential offsite liabilities associated with the Site.

Beginning in November 2005 and continuing to the present day, Home Depot has been submitting Monitoring and Reporting reports to the Regional Board, which have provided monthly updates on the Site assessment and remediation activities.

**SUMMARY OF TECHNICAL REPORT**

The scope of work (SOW) in the Work Plan proposes the following:

MARIA MEHRANIAN, CHAIR | SAMUEL UNGER, EXECUTIVE OFFICER

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The selection and full scale design for the treatment of the shallow zone (i.e., zone that consists of onsite soil and groundwater occurring above the Site-wide FGL), which has been impacted by chromium (total and hexavalent) at the Site. This Work Plan (RAP Amendment) amends the Site's earlier RAP and includes the proposed focused treatment of hexavalent chromium (CrVI) in soil and groundwater. The main objectives of the RAP Amendment are as follows:

1. Present the current Site Conceptual Model (SCM);
2. Establish appropriate Remedial Action Objectives (RAOs);
3. Propose a shallow zone soil and groundwater treatment of residual CrVI that will be implemented to achieve the RAOs;
4. Propose a monitoring and reporting program that will be performed before during and after implementation of the treatment;
5. Present the criteria that will be used for obtaining Site closure; and
6. Satisfy the requirements of the "Revised General Waste Discharge Requirements for Groundwater Remediation at Petroleum Hydrocarbon fuel Volatile Organic Compounds and/or CrVI Impacted Sites (Order No. R4-2007-0019) such that the General Waste Discharge Requirements (SCDRs) may be deemed applicable for the project upon submission of a report of Waste Discharge (RoWD) application.

To meet the objectives described above, the Regional Board understands the following steps are to be completed during the implementation of this RAP Amendment:

The treatment area will be the central portion of the Site and will be the area of focus based on recent and historic data for chromium (Cr). The treatment is designed to target the impacted soil above the shallow zone groundwater and stabilize the Cr so that future increases in groundwater elevation will not result in increased CrVI concentrations in groundwater. Additionally, the treatment is designed to significantly reduce contamination of CrVI in the shallow zone groundwater, which will also reduce the potential for the migration to the regional A Zone groundwater located below the FGL.

To achieve Site closure in a short timeframe, the treatment approach selected is aggressive with an emphasis on its effectiveness at reducing the CrVI concentrations in a relatively short timeframe. This approach will minimize the disruption of the active Home Depot store retail operations.

During the implementation of the treatment approach, the following steps will be completed by Home Depot:

- Permitting,
- Health and Safety,
- Geophysical Investigation,
- Soil Treatment,
- Groundwater Treatment,

- Performance Monitoring during injections, and
- Contingency plan to protect human health and the environment.

#### REGIONAL BOARD COMMENTS

The Regional Board considers the Report to be complete and based on the review of the Report; the proposed RAP Amendment is approved with the following additions:

1. The Regional Board will be notified 1-week in advance of work activities, and
2. The due date for submitting the final report is 180 calendar days after the completion of the implementation of the RAP Amendment.

The State Water Board adopted regulations requiring the electronic submittals of information over the internet using the State Water Board GeoTracker data management system. You are required not only to submit hard copy reports required in this Order, but also to comply by uploading all reports and correspondence prepared to date on to the GeoTracker data management system. The text of the regulations can be found at the URL:

[http://www.waterboards.ca.gov/ust/cleanup/electronic\\_reporting/docs/final\\_electronic\\_regs\\_dec04.pdf](http://www.waterboards.ca.gov/ust/cleanup/electronic_reporting/docs/final_electronic_regs_dec04.pdf).

**If you have any questions, please contact Mr. Larry Moore, Project Manager, at (213) 576-6730 or at [Lawrence.Moore@Waterboards.ca.gov](mailto:Lawrence.Moore@Waterboards.ca.gov).**

Sincerely,



Samuel Unger, P.E.  
Executive Officer

cc: Ms. Lisa Hanusiak, USEPA Region 9  
Mr. Leo Chan, City of Glendale  
Mr. Bill Mace, City of Burbank Water Supply Department  
Mr. Vahe Dabbaghian, Los Angeles Department of Water & Power  
Mr. Milad Taghavi, Los Angeles Department of Water & Power  
Mr. Richard Slade, ULARA Watermaster  
Ms. Karen Kosiarek, Geosyntec Consultants  
Ms. Mital Desai, Geosyntec Consultants